

Hon. Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

TODD BUKATY and ERICA BUKATY,

Plaintiffs,

v.

ANGELO CALFO and his marital  
community; YARMUTH WILSDON  
CALFO PLLC; and WELLS FARGO  
BANK,

Defendants.

No. CV09-0039

DECLARATION OF ANDREA D.  
OSTROVSKY IN SUPPORT OF  
MOTION TO SEAL DEFENDANTS'  
UNREDACTED REPLY TO  
PLAINTIFFS' RESPONSE TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT

I, Andrea D. Ostrovsky, declare and testify as follows:

1. I am one of the attorneys representing defendants Angelo J. Calfo and Yarmuth Wilsdon Calfo PLLC ("YWC") in this matter. I am over eighteen years of age and am competent to testify herein. I make the following statement based on my own personal knowledge.

2. Defendants' reply to plaintiffs' response to defendants' motion for summary judgment contains numerous details regarding YWC's representation of Beverlee Kamerling, including the fee arrangement and Ms. Kamerling's explanation of the source of funds to pay for her legal fees. These attorney-client communications are confidential pursuant to RPC 1.6 and the operative Protective Order in this case, and defendants have

1 sought to limit their disclosure of these confidences by seeking to file the unredacted reply  
2 brief under seal.

3 I declare under penalty of perjury under the laws of the United States of America  
4 that the foregoing is true to the best of my knowledge.

5 Dated this 20th day of November, 2009, at Seattle, Washington.

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7 By: /s/ Andrea Delgadillo Ostrovsky  
Andrea Delgadillo Ostrovsky

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DECLARATION OF ANDREA D. OSTROVSKY IN  
SUPPORT OF MOTION TO SEAL DEFENDANTS'  
REPLY RE: MOTION FOR SUMMARY JUDGMENT  
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